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Sent: Wednesday, June 18, 2008 7:23 AM
To: Yun, Joseph; DWR IRWM Grants
Cc: Bordas, Hector; Kuo, Frank
Subject: Greater Los Angeles County IRWM Region Comments on Prop 84 and 1E Guidelines

Good morning Joe.

Thank you for conducting the workshops to obtain input on the development of the guidelines for Prop 84 and 1E. The following comments are from the Greater Los Angeles County IRWM Region. If you have any questions, please feel free to give me a call.

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Region Acceptance Process

The guidelines for the region acceptance process should be developed to be consistent with the Department of Water Resources' prior standing. Guidelines should be clear, help facilitate collaboration, and help avoid duplicative or overlapping efforts. Outreach to all stakeholders in a region should continue to ensure decision makers are obtaining input and addressing issues from all water management areas. These should continue to include open space, sanitation, stormwater/water quality, surface water, water supply, and flood management with additional focus on unmet needs of disadvantaged communities.

In addition, the guidelines for region acceptance should not apply to (or exempt) IRWM regions that have already been established, accepted by the Department of Water Resources, developed an adopted IRWM Plan, and have been awarded Proposition 50 grant funds. The Greater Los Angeles County IRWM Region, for example, was formed as a result of direction from the Department of Water Resources to consolidate its sub-regions. It was formed through substantial efforts. Requiring this region and all prior accepted regions to go through this process sets our progress back to before 2005. In Los Angeles County, we have based the plans and strategies of more than 50 agencies to include the entire Greater Los Angeles County IRWMP boundary.

The guidelines should also prevent sub-regions from breaking off from regions to form new regions to compete for funding. This is essentially the dis-integration of stakeholders, which diminishes collaboration, creates conflict with competing

regions, and creates a burden on the Department of Water Resources and State Water Resources Control Board to manage more IRWM regions.

Funding Areas

Funding areas for Proposition 84 contain multiple IRWM regions. While cooperation and discussion is important within and amongst regions, it is important to recognize that resolution to funding may not always be possible. The guidelines should include language to designate Prop. 84 grant funding for regions to be consistent with the Proposition's funding mechanism of a fixed base allocation with a variable amount based on population. This is consistent with the voter base in the Greater Los Angeles County IRWMP area for the Prop. 84 bond measure. In addition, the Greater Los Angeles County IRWMP comprises 26 percent of the State's population, and the taxpayers of the bond measure within this region should receive a proportionate amount of funding to benefit their communities.

Funding for Administration Costs

The guidelines should include a mechanism to provide IRWM areas with funding for administration costs that would be provided early in the funding process. While planning grants are available early for the development and updating of IRWM Plans, additional work is necessary for IRWM administration and project planning. This includes such work as coordination between the agencies, preparation of MOUs, agreements, and contracts, and various reporting requirements. The majority of this work is conducted prior to project construction and therefore, should not be included within the project costs for reimbursement. It should instead, be provided upfront and based on a percentage of the funds for project implementation, similar to the Department of Water Resources' administration costs.